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Attorneys for Defendants  
State of California by and through California  
Highway Patrol and Officer Ramon Silva

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

SANDRA KIRKMAN AND  
CARLOS ALANIZ,  
INDIVIDUALLY AND AS  
SUCCESSORS-IN-INTEREST TO  
JOHN ALANIZ, DECEASED,

Plaintiff,

v.

STATE OF CALIFORNIA;  
RAMON SILVA; AND DOES 1-10,  
INCLUSIVE,

Defendant.

Case No.: 2:23-cv-07532-DMG-SSC

**TRIAL STIPULATION**

Courtroom: 8C  
Judge: Hon. Dolly M. Gee

FPTC Date: March 25, 2025  
Trial Date: April 15, 2025

After meeting and conferring on motions in limine, the parties stipulate as follows:

1. The parties will not attempt in any manner to introduce any evidence relating to Officer Ramon Silva's or Officer John Van Dragt's personnel record, including complaints or disciplinary matters, or prior or subsequent uses of force, whether such evidence is positive or negative (e.g., whether an officer did or did not have complaints, disciplinary actions, or prior uses of force).

2. Defendants will not attempt to introduce any evidence regarding the toxicology results of the decedent taken in connection with his autopsy.

3. The parties will not contest the authenticity of any evidence disclosed during discovery by the parties or any third party.

4. The parties will not introduce the findings of any investigations or internal reviews of the shooting and evidence that authorities decided not to discipline or press criminal charges against Ramon Silva in relation to this incident.

Dated: March 14, 2025

Dean Gazzo Roistacher LLP

By: /s/ *Lee H. Roistacher*

Lee H. Roistacher<sup>1</sup>

Attorneys for Defendants

State of California by and through

California Highway Patrol and

Officer Ramon Silva

DATED: March 14, 2025

**LAW OFFICES OF DALE K. GALIPO**

By: */s/ Cooper Alison-Mayne*

Dale K. Galipo, Esq.

Cooper Alison-Mayne

*Attorneys for Plaintiffs*

<sup>1</sup> Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.